

### REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-18 are currently pending, with Claims 5-18 withdrawn from consideration. Claim 4 has been amended by the present amendment. No new matter has been added.

In the outstanding Office Action, Claim 4 was rejected under 35 U.S.C. § 112, second paragraph, as being indefinite; Claim 1 was rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Publication No. 2002/0030268 to Sakamoto et al. (hereafter “the ‘268 publication”); Claims 2 and 3 were rejected under 35 U.S.C. § 103(a) as unpatentable over the ‘268 publication; and Claim 4 was rejected under 35 U.S.C. § 103(a) as unpatentable over the ‘268 publication in view of U.S. Patent No. 6,233,817 to Ellis et al. (hereafter “the ‘817 patent”).

First, Applicants wish to thank Examiner Li and Primary Examiner Nadav for the courtesy of a personal interview granted to Applicants’ representatives on January 14, 2009, during which the outstanding issues in the present application were discussed. During the interview, agreement was reached that the outstanding 35 U.S.C. § 102(b) rejection of Claim 1 will be withdrawn based on the arguments presented during the interview. Specifically, Applicants’ representatives explained that the ‘268 publication lacks *an insulating layer in between the plurality of the circuit pads and the metal plate*, as recited in Claim 1. In fact, the element cited by the outstanding Office Action is conductive paste 55C illustrated in Figure 9A of the ‘268 publication. Further, the rejection of Claim 4 under 35 U.S.C. § 112, second paragraph, was discussed.

Applicants respectfully traverse the rejection of Claim 1 under 35 U.S.C. § 102(b) and of Claims 2-4 under 35 U.S.C. § 103(a). As discussed (and agreed to) during the interview, the primary reference (the ‘268 publication) fails to teach or suggest an insulating layer in

between the plurality of the circuit pads and the metal plate, as recited in Claim 1. Therefore, Claim 1 (and all associated dependent claims) patentably defines over the '268 publication.

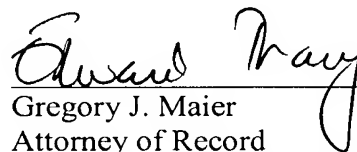
Accordingly, Applicants respectfully request that the rejection of Claim 1 under 35 U.S.C. § 102(b) be withdrawn. Further, Applicants respectfully submit that it would not be obvious to add an insulating layer as recited in Claim 1, nor does the '817 patent cure the deficiency of the '268 publication. Accordingly, Applicants respectfully request that the rejections of Claims 2-4 under 35 U.S.C. § 103(a) be withdrawn.

In response to the rejection of Claim 4 under 35 U.S.C. § 112, second paragraph, Claim 4 has been amended to clarify that the low capacitance portion is below the insulating layer. Applicants respectfully submit that amended Claim 4 is definite, and request that the rejection of Claim 4 under 35 U.S.C. § 112, second paragraph, be withdrawn.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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